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December 3, 1993

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: MM Docket No. 93-250  
RM-8331  
Fairview, Pennsylvania  
KDC, Inc.

Dear Mr. Caton:

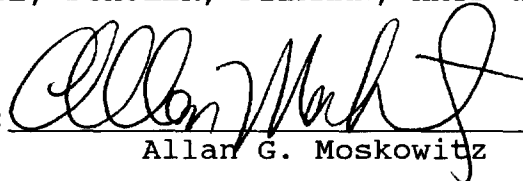
On behalf of KDC, Inc., we are filing herewith an original and four copies of its "Reply Comments" to the Notice of Proposed Rule Making to assign Channel 298A to Fairview, Pennsylvania.

Should any questions arise with respect to this matter, please contact the undersigned counsel.

Respectfully submitted,

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER

By:

  
Allan G. Moskowitz

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BEFORE THE

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**Federal Communications Commission**

DEC - 3 1993

WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202(b) ) MM Docket No. 93-250  
 )  
Table of Allotments ) RM-8331  
 )  
FM Broadcast Stations )  
(Fairview, Pennsylvania) )

TO: Chief, Policy and Rules Division

**REPLY COMMENTS**

KDC, Inc. ("KDC"), by its attorney and pursuant to Section 1.420 of the Commission's Rules, hereby submits its "Reply Comments" in the above-captioned FM Rulemaking Proceeding in which, by Notice of Proposed Rule Making ("NPRM"), DA 93-1145, released September 30, 1993, the Commission, at the request of KDC, proposed the allotment of Channel 298A to Fairview, Pennsylvania, as that community's first local aural transmission service.

In support thereof, the following is respectfully shown:

1. In response to the NPRM, a counterproposal was filed by Thomas J. Sauber ("Sauber"), proposing Channel 298A to Cambridge Springs, Pennsylvania, as its first local transmission service, and a counterproposal was filed by North Kingsville Broadcasting ("NKB"), requesting the allotment of Channel 298A to North Kingsville, Ohio, as that community's first local service. Consequently, both counterproposals are mutually exclusive with

KDC's proposal that Channel 298A be allotted to Fairview, Pennsylvania.

**All Three Proposals Can Be Accommodated**

2. Attached hereto is the Engineering Report of Glen Clark & Associates, engineering consultants to KDC. As indicated by Mr. Clark, Channel 241A may be allotted to North Kingsville, Ohio in compliance with all the domestic spacings required by Section 73.207(b)(1) of the Commission's Rules. Similarly, Channel 283A can be allotted to Cambridge Springs, Pennsylvania, in compliance with all the domestic spacings required by Section 73.207(b)(1). While both allotments would be short, pursuant to Section 73.207(b)(2), to certain Canadian allotments, the theoretical overlap would occur over water. Furthermore, since an ERP of more than 6 kW would be permissible on both Channels 241A and 283A from the proposed reference coordinates towards Canada, the use of 6 kW non-directional operation for both Channel 241A at North Kingsville, Ohio and Channel 283A at Cambridge Springs, Pennsylvania is feasible and would, therefore, avoid prohibited overlap with the Canadian signals. Therefore, KDC respectfully requests that the Commission consider specially negotiated allotments with the Canadian government for these two channels similar to that already proposed by the Commission for the Fairview proposal. Additionally, Channel 241A can be allotted to North Kingsville at the same coordinates provided by NKB, and

Channel 283A can be allotted to Cambridge Springs at the same coordinates provided by Sauber.

3. It is well established that it is the Commission's policy to presume that channels of the same class are equivalent for allotment purposes. See, Churubusco, Huntington, Roanoke and South Whitley, Indiana, 67 RR 2d 606 (1990). See also, the Appendix to the NPRM at 3(c): "The filing of a Counterproposal may lead the Commission to allot a different channel than was requested for any of the communities involved." In the instant situation, the alternate channels are not only equivalent in terms of class but the substitute channels proposed by KDC for North Kingsville and Cambridge Springs can be allotted at the identical reference coordinates proposed by NKB and Sauber, respectively. Consequently, separate first local services on equivalent Class A channels at the reference coordinates proposed in each mutually exclusive proposal can be allotted to Fairview, Cambridge Springs and North Kingsville in this proceeding.

**Fairview Should Be The Preferred Community**

4. Sauber relies on the analysis utilized by the Commission in FM Channel Assignments (Eaton, Sandy Springs, Georgia; Anniston, Lineville, Alabama) ("Sandy Springs"), 6 FCC Rcd 6580, 6585, (Chief, Mass Media Bureau, 1991) to support its allegation that Channel 298A should not be allotted to Fairview as a first local service because Fairview is merely a suburb of Erie. However, Sauber's argument is misplaced. In Sandy Springs

and those cases upon which it relied,<sup>1</sup> the Commission set forth the type of evidence to consider in determining whether a suburban community should be denied a first local service preference when requesting a change of community of license. KDC is not requesting a change of community of license: It is requesting a new local service. Therefore, Sandy Springs and the analysis contained therein is not on point. See, Remington and Falmouth, Virginia, DA 93-1045, released September 7, 1993, at Footnote 5, where the Commission rejected an identical attempt to rely on a "change of community" analysis in a "new community" proceeding.

5. The appropriate analysis of the instant mutually exclusive proposals must be based on In Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982), where the Commission set forth the following allotment priorities:

- A. First full-time aural service;
- B. Second aural service;
- C. First local service; and
- D. Other public interest matters.

Here, none of the proposals allege the provision of a first or second aural service. Rather, all three equally propose first local services to their respective communities. Consequently, the Commission must turn to priority D, "Other public interest

---

<sup>1</sup> RKO General (KFRC), 5 FCC Rcd 3222 (1990); Faye and Richard Tuck (Tuck), 3 FCC Rcd 5374 (1988).

matters." The most important factor is that of population. Pursuant to the 1990 U.S. Census, North Kingsville has a population of 2,672, Fairview has a population of 1,988, while Cambridge Springs only has a population of 1,837. While both Sauber and NKB attach great weight to the fact that Fairview is located close to Erie, Pennsylvania and receives a number of services, Cambridge Springs is not as isolated as Sauber suggests in that it is only 20 miles from downtown Erie, approximately the same distance as Rockville, Maryland is from Washington, D.C. In fact, Cambridge Springs is listed as a part of the Erie metropolitan telephone book as is part of the Erie ADI. Cambridge Springs also receives service from stations in nearby Meadville, Edinboro and Saegertown. North Kingsville is only 5 miles from Ashtabula, Ohio which has three radio services licensed to it; is only 5 miles from Conneaut, Ohio which also has two radio services licensed to it; and is equidistant (approximately 30-35 miles in each direction) from both Cleveland, Ohio and Erie, Pennsylvania. Consequently, all of the communities involved receive a commensurate amount of service. In terms of economic need, Cambridge Springs' population between 1980 and 1990 decreased by nearly 13%. Similarly, North Kingsville's population dropped 9% between 1980 and 1990. Fairview, however, grew from 1,855 in 1980 to 1,988 in 1990, a population gain of more than 8%. Similarly, the Township of Fairview, of which the Borough of Fairview is the economic center, also grew between the 1980 and 1990 U.S. Census.

6. Therefore, pursuant to the Commission's standard comparative criteria for mutually exclusive allotment proposals, while North Kingsville is ostensibly the largest of the three communities, its population and importance is declining. Cambridge Springs is the smallest of the communities, and its population is declining also. While Fairview is not the largest of the three communities, at least it is a vibrant, growing community with a present and future need for a first local service.

7. Consequently, should the Commission decide that, despite the attached engineering showing, only one channel can be awarded amongst the three communities, KDC submits that the public interest would be served by allotting Channel 298A at Fairview, Pennsylvania. Should the Commission find that only two of the three channels proposed in the attached engineering can be allotted among the three communities, KDC submits that the public interest would be best served by allotting Channel 298A at Fairview and one of the other two channels (whichever is feasible) to North Kingsville because of its greater population over Cambridge Springs. Obviously, should the Commission agree with KDC that each of the proposed communities can be allotted a separate, equivalent channel, KDC supports that solution.

8. Finally, contrary to Sauber's allegation, Fairview possesses more than the requisite indicia of community identity. Fairview was founded in 1792 and was incorporated as a Borough in 1868. Like Cambridge Springs, Fairview has a Borough form of

government, has a full-time police department, a fire department, post office, elementary, middle and high schools, innumerable commercial establishments including a supermarket, car dealership, restaurants, funeral home, etc. Fairview has six churches, a bank, doctors, dentists, and its own tax collector. Fairview also has a Senior Center, an American Legion post, the Fairview Business Association and The Historical Museum. As indicated, Fairview Borough is the heart of Fairview Township (1990 population, 7,845). Consequently, Fairview easily qualifies as a separate community for allotment purposes. See, Brighton, New York, 8 FCC Rcd 793 (1993).

9. KDC reiterates its intention of submitting an application for a new FM radio station construction permit for Channel 298A at Fairview, Pennsylvania if the Commission assigns that channel to Fairview. Further, KDC presently commits itself to construct the station as expeditiously as possible if its application is granted.

### **Conclusion**

10. KDC submits that, pursuant to the Commission's allotment priorities, should the Commission conclude that it is feasible for only one channel to be allotted in this proceeding, the public interest mandates that Channel 298A be allotted to Fairview, Pennsylvania as that community's first local service. Should the Commission find that two channels are feasible for allotment, then the channels should be allotted to Fairview and North Kingsville, Ohio. However, as reflected in the attached



engineering statement, KDC believes that it is feasible, and strongly supports its proposal, to allot equivalent Class A channels to each of the three communities.


11. Therefore, KDC respectfully requests that the Commission amend the FM Table of Allotments, Section 73.202(b), as follows:

	<u>PRESENT</u>	<u>PROPOSED</u>
North Kingsville, OH	---	241A
Fairview, PA	---	298A
Cambridge Springs, PA	---	283A

Respectfully submitted,

KDC, INC.

By: \_\_\_\_\_

  
Allan G. Moskowitz  
Its Attorney

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(202) 682-3501

December 3, 1993

ENGINEERING REPORT

IN SUPPORT OF  
REPLY COMMENTS  
IN RM-8331, MM DOCKET 93-250  
PROPOSING TO ADD CHANNEL 298A AT  
FAIRVIEW, PENNSYLVANIA

KDC, Inc.

NOVEMBER 1993

Glen Clark & Associates  
Broadcast Consultants

---

Greenville, PA

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## ENGINEERING STATEMENT

The following analysis and materials have been prepared on behalf of KDC, Inc. ("KDC"), Petitioner in RM-8331, MM DOCKET 93-250.

### INTRODUCTION

In September of 1993, KDC, Inc. filed a Petition to modify the FM Table of Allotments by adding Channel 298A at Fairview, Pennsylvania. The proposal satisfied all domestic FM spacings required under Part 73.207(b)(1) of FCC Rules. As shown in Table 1, a minor shortspacing to a vacant Class A allotment at Welland, Ontario, Canada would be experienced at the chosen coordinates. This condition is a result of the fact that 6 kilowatt, US allotments are treated as Class B1 allotments with reference to Canadian allotments under Part 73.207(b)(2) of FCC Rules. However, as the majority of the implied overlap would occur over water, and as Petitioner agreed to employ a directional antenna to provide required protection to the Canadian allotment, the proposal is acceptable under the US-Canadian agreement.

On September 30th of this year and in response to KDC's Petition, the Commission Released a Notice of Proposed Rulemaking, stating intention to modify the FM Table of Allotments by adding Channel 298A at Fairview, Pennsylvania. Reference numbers RM-8331 and MM DOCKET 93-250 were assigned to this proceeding.

Two parties responded on the Comment date with counterproposals: North Kingsville Broadcasters ("NKB") proposed to allot Channel 298A to North Kingsville, Ohio. Thomas J. Sauber ("Sauber") proposed to allot Channel 298A to Cambridge Springs, Pennsylvania. Both counterproposals are mutually-exclusive with the original proposal at Fairview.

Both counterproposals acknowledge that they, like the original proposal, provide less than the full spacing required under Part 73.207(b)(2) with reference to Welland, Ontario, Canada. Tables 2 and 3 shows the spacings of interest for North Kingsville and Cambridge Springs, respectively, when the proposed allotments are treated as Class B1 facilities with reference to Canada. Figure 1 shows the "permissible area" where Channel 298A could be located and includes the reference points chosen by the proponents for Fairview, North Kingsville and Cambridge Springs.

### ALTERNATIVE CHANNELS EXIST FOR ALL PARTIES

As shown in the materials which follow, alternative channels exist for both Cambridge Springs and for North Kingsville, negating the need for the Commission to choose among these three meritorious proposals.

### THE ALLOCATION SITUATION FOR CHANNEL 241A AT NORTH KINGSVILLE, OHIO

KDC proposes to satisfy NKB's expressed desire for an FM broadcast channel at North Kingsville by allotting Channel 241A to that community.

Table 4 shows spacings of interest when Channel 241A (96.1 MHz) is evaluated at the North Kingsville coordinates provided by NKB. All domestic spacings required by Part 73.207(b)(1) of FCC Rules are satisfied. The domestic spacing arcs are shown in Figures 2 and 3, along with the reference site proposed by NKB. Figures 2 and 3 are identical, except that Figure 3 employs an enlarged scale to show greater detail.

Table 4 also shows that the North Kingsville site is located at less than the distance required by Part 73.207(b)(2) with reference to CFPL-FM at London, Ontario, Canada. However, the implied overlap would occur over water. Further, discussions with members of the Commission's International Branch staff indicate that an ERP of 9.9 kilowatts would be permissible on Channel 241A from the coordinates proposed by NKB. As this power is greater than 6 kilowatts, non-directional, 6 kilowatt operation at North Kingsville on Channel 241A would be possible.

### THE ALLOCATION SITUATION FOR CHANNEL 283A AT CAMBRIDGE SPRINGS, PENNSYLVANIA

KDC proposes to satisfy Sauber's expressed desire for an FM broadcast channel at Cambridge Springs by allotting Channel 283A to that community.

Table 5 shows spacings of interest when Channel 283A (104.5 MHz) is evaluated at the Cambridge Springs coordinates provided by Sauber. All domestic spacings required by Part 73.207(b)(1) of FCC Rules are satisfied. The domestic spacing arcs are shown in Figures 4 and 5, along with the reference site proposed by Sauber. Figures 4 and 5 are identical, except that Figure 5 employs an enlarged scale to show greater detail.

Table 4 also shows that the Cambridge Springs site is located at less than the distance required by Part 73.207(b)(2) with reference to CHUM-FM at Toronto, Ontario, Canada. However, the implied overlap would occur over water. Further, discussions with members of the Commission's International Branch staff indicate that an ERP in excess of 10 kilowatts would be permissible on Channel 283A from the coordinates proposed by Sauber. As this power is greater than 6 kilowatts, non-directional, 6 kilowatt operation at Cambridge Springs on Channel 283A would be possible.

EXPRESSION OF THE INSTANT COUNTERPROPOSAL  
IN STANDARD FORM

Expressed in standard notation, the instant counterproposal is summarized as follows:

	<u>PRESENT</u>	<u>PROPOSED</u>
NORTH KINGSVILLE, OH	- -	241A
FAIRVIEW, PA	- -	298A
CAMBRIDGE SPRINGS, PA	- -	283A

RESPONSE TO SAUBER'S COMMENTS ON DIRECTIONAL ANTENNAS

At page 3 of the Engineering Exhibit, Sauber goes to great lengths to determine the Effective Radiated Power which could be radiated from Channel 298A facilities located both at Fairview and at Cambridge Springs. At mid-page Sauber concludes that 6 kilowatts non-directional would be possible from Cambridge Springs, while a power limitation to approximately 4 kilowatts would be necessary at Fairview.

KDC does not take issue with that technical analysis. In its original Proposal, KDC acknowledged that a northward-facing power limitation would be necessary to provide proper protection to Canadian authorizations.

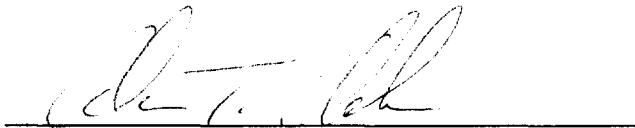
However, there is a clear innuendo in the Sauber narrative that this power reduction lessens the value of the allotment at Fairview. This is simply not true.

The Fairview coordinates are within two miles of the Lake Erie shoreline to the north. A northward null, facing Welland, falls harmlessly across the Lake. While the total number of square kilometers within the 60 dBu contour would be reduced slightly due to this power limitation, this reduction in area would be entirely over water. The number of square kilometers over land would not be reduced. No reduction in population, in utility of the allotment, or the benefit to the public would be caused.

While KDC does not disagree with Sauber's technical conclusion, the conclusion is irrelevant. Sauber's clear innuendo that this power limitation would in some way negatively affect a Fairview allotment is not supported by the facts.

ENGINEER'S ATTEST

The preceding materials were prepared by me or under my direct supervision, and are true and correct to the best of my knowledge and belief.



November 30, 1993

Glen T. Clark, P.E.  
Georgia Registration #18713

\* \* \* \* \*

\*\*\*\*\*  
 \* PROGRAM FMSRCH \*  
 \* COPYRIGHT 1986 AND 1991 BY GLEN CLARK \*  
 \* VERSION 1.5 - 31 MAY 1992 \*  
 \*\*\*\*\*

STUDY NAME - FAIRVIEW PA

SEARCHED FROM CHANNEL 298 TO CHANNEL 298.

CLASS OF CHANNEL STUDY: A

THE BUFFER DISTANCE IS - 70.00 KM.

CLASS D STATIONS NOT INCLUDED IN PRINTOUT.

REFERENCE CO-ORDINATES: 42 1 46 North Latitude  
 80 15 21 West Longitude

CITY/STATE/COUNTRY	CALL	POWER	HEIGHT	TD2	STATUS	CHANNEL	BUFFER	REQ	DIST	AZIMUTH	LATITUDE	LONGITUDE	FILE #
CHANNEL 298													
Welland	ON CA	0.00	0	NNN	FA	298A	-45.6	180.0	134.40	37.5	42 59 0	79 15 0	
Stratford	ON CA	0.00	0	NNN	FA	298A	-20.9	180.0	159.06	339.4	43 22 0	80 57 0	
Lakewood	NY US	0.00	0	NNN	FA VACANT	295B1	31.7	48.0	79.69	90.8	42 0 54	79 17 38	
Lakewood	NY US NEW	25.00	100	NNN	FM APP	295B1	33.4	48.0	81.39	91.3	42 0 33	79 16 25	930527ME
Lakewood	NY US NEW	25.00	100	NNN	FM APP	295B1	33.4	48.0	81.44	91.3	42 0 30	79 16 23	930527MQ
Lakewood	NY US NEW	25.00	100	NNN	FM APP	295B1	33.4	48.0	81.44	91.3	42 0 30	79 16 23	930527MG
Lakewood	NY US NEW	25.00	100	NNN	FM APP	295B1	33.4	48.0	81.44	91.3	42 0 30	79 16 23	930525MD
Lakewood	NY US NEW	25.00	100	NNN	FM APP	295B1	33.7	48.0	81.67	94.5	41 58 5	79 16 25	930528MC
Lakewood	NY US NEW	5.20	218	NNN	FM APP	295B1	34.1	48.0	82.09	95.2	41 57 31	79 16 11	930527MH
Cleveland	OH US WENZ	16.00	272	NYN	FM LIC	300B	37.2	69.0	106.24	234.1	41 27 54	81 17 13	BLH870220KG
Cleveland	OH US	0.00	0	NNN	FA USED	300B	37.3	69.0	106.30	234.3	41 28 3	81 17 25	
Greenville	PA US	0.00	0	NNN	FA USED	296A	41.6	31.0	72.59	190.2	41 23 10	80 24 35	
Greenville	PA US WEXC	3.00	73	NNN	FM LIC	296A	41.6	31.0	72.59	190.2	41 23 10	80 24 35	BLH5859
Wheeling	WV US WEGW	10.50	269	NNN	FM CP	298B	44.5	178.0	222.51	190.9	40 3 41	80 45 8	BPH9204031E
Wheeling	WV US	0.00	0	NNN	FA USED	298B	44.5	178.0	222.51	190.9	40 3 41	80 45 8	
Wheeling	WV US WEGW	12.50	265	NNN	FM LIC	298B	44.5	178.0	222.51	190.9	40 3 41	80 45 8	BLH3032
Dubois	PA US WDBA	50.00	152	NNN	FM LIC	297B	47.3	113.0	160.27	125.1	41 11 28	78 41 27	BLH6868
Dubois	PA US	0.00	0	NNN	FA USED	297B	47.3	113.0	160.27	125.1	41 11 28	78 41 27	
Elyria	OH US WNWV	50.00	142	NNN	FM LIC	297B	55.4	113.0	168.36	240.4	41 16 10	82 0 16	BLH860820KA
Elyria	OH US	0.00	0	NNN	FA USED	297B	55.4	113.0	168.36	240.4	41 16 10	82 0 16	
Detroit	MI US	0.00	0	NNN	FA USED	298B	56.9	178.0	234.94	279.9	42 21 28	83 3 56	
Detroit	MI US WGPR	50.00	110	NNN	FM LIC	298B	56.9	178.0	234.94	279.9	42 21 28	83 3 56	BLH4692
Wethersfield Town	NY US	0.00	0	NNN	FA USED	299B	62.1	113.0	175.11	67.1	42 37 23	78 17 16	
Wethersfield Town	NY US WNUC	11.50	244	NNN	FM LIC	299B	62.1	113.0	175.11	67.1	42 37 23	78 17 16	BLH850226KP
Clarendon	PA US WOVU	4.70	113	NNN	FM CP	295A	62.4	31.0	93.38	104.5	41 48 50	79 10 4	BPH920306MA
Mercer	PA US WLLF	1.40	148	NNN	FM LIC	244A	69.7	10.0	79.71	181.3	41 18 43	80 16 39	BLH871130KD
Mercer	PA US	0.00	0	NNN	FA USED	244A	69.7	10.0	79.71	181.3	41 18 43	80 16 39	

STUDY COMPLETE.  
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TABLE 1

Computer printout showing spacings  
 of interest for Channel 298A near  
 Fairview, Pennsylvania



\*\*\*\*\*  
 \* PROGRAM FMSRCH \*  
 \* COPYRIGHT 1986 AND 1991 BY GLEN CLARK \*  
 \* VERSION 1.5 - 31 MAY 1992 \*  
 \*\*\*\*\*

STUDY NAME - NORTH KINGSVILLE PA

SEARCHED FROM CHANNEL 298 TO CHANNEL 298.

CLASS OF CHANNEL STUDY: A

THE BUFFER DISTANCE IS - 70.00 KM.

CLASS D STATIONS NOT INCLUDED IN PRINTOUT.

REFERENCE CO-ORDINATES: 41 54 18 North Latitude  
 80 41 36 West Longitude

CITY/STATE/COUNTRY	CALL	POWER	HEIGHT	TD2	STATUS	CHANNEL	BUFFER	REQ	DIST	AZIMUTH	LATITUDE	LONGITUDE	FILE #
CHANNEL 298													
Stratford	ON CA	0.00	0	NNN	FA	298A	-16.3	180.0	163.73	352.7	43 22 0	80 57 0	
Welland	ON CA	0.00	0	NNN	FA	298A	-11.3	180.0	168.67	44.2	42 59 0	79 15 0	
Cleveland	OH US	WENZ	16.00	272	NYN FM LIC	300B	0.5	69.0	69.50	225.4	41 27 54	81 17 13	BLH870220KG
Cleveland	OH US		0.00	0	NNN FA USED	300B	0.5	69.0	69.51	225.7	41 28 3	81 17 25	
Elyria	OH US		0.00	0	NNN FA USED	297B	17.1	113.0	130.14	237.5	41 16 10	82 0 16	
Elyria	OH US	WNWV	50.00	142	NNN FM LIC	297B	17.1	113.0	130.14	237.5	41 16 10	82 0 16	BLH860820KA
Detroit	MI US		0.00	0	NNN FA USED	298B	24.5	178.0	202.49	285.2	42 21 28	83 3 56	
Detroit	MI US	WGPR	50.00	110	NNN FM LIC	298B	24.5	178.0	202.49	285.2	42 21 28	83 3 56	BLH4692
Wheeling	WV US		0.00	0	NNN FA USED	298B	26.8	178.0	204.80	181.4	40 3 41	80 45 8	
Wheeling	WV US	WEGW	10.50	269	NNN FM CP	298B	26.8	178.0	204.80	181.4	40 3 41	80 45 8	BPH9204031E
Wheeling	WV US	WEGW	12.50	265	NNN FM LIC	298B	26.8	178.0	204.80	181.4	40 3 41	80 45 8	BLH3032
Greenville	PA US		0.00	0	NNN FA USED	296A	31.3	31.0	62.29	157.7	41 23 10	80 24 35	
Greenville	PA US	WEXC	3.00	73	NNN FM LIC	296A	31.3	31.0	62.29	157.7	41 23 10	80 24 35	BLH5859
Mercer	PA US	WLLF	1.40	148	NNN FM LIC	244A	64.4	10.0	74.43	152.2	41 18 43	80 16 39	BLH871130KD
Mercer	PA US		0.00	0	NNN FA USED	244A	64.4	10.0	74.43	152.2	41 18 43	80 16 39	
Canton	OH US	WRQKFM	27.50	104	NNN FM LIC	295B	66.1	69.0	135.06	207.2	40 49 17	81 25 34	BLH1822
Canton	OH US		0.00	0	NNN FA USED	295B	66.1	69.0	135.06	207.2	40 49 17	81 25 34	
Lakewood	NY US		0.00	0	NNN FA VACANT	295B1	68.7	48.0	116.66	83.5	42 0 54	79 17 38	
Lakewood	NY US	NEW	25.00	100	NNN FM APP	295B1	70.0	48.0	117.95	86.1	41 58 5	79 16 25	930528MC

STUDY COMPLETE.  
 19 RECORDS PRINTED.

## TABLE 2

Computer printout showing spacings  
 of interest for Channel 298A near  
 North Kingsville, Ohio

\*\*\*\*\*  
 \* PROGRAM FMSRCH \*  
 \* COPYRIGHT 1986 AND 1991 BY GLEN CLARK \*  
 \* VERSION 1.5 - 31 MAY 1992 \*  
 \*\*\*\*\*

STUDY NAME - CAMBRIDGE SPRINGS PA

SEARCHED FROM CHANNEL 298 TO CHANNEL 298.

CLASS OF CHANNEL STUDY: A

THE BUFFER DISTANCE IS - 70.00 KM.

CLASS D STATIONS NOT INCLUDED IN PRINTOUT.

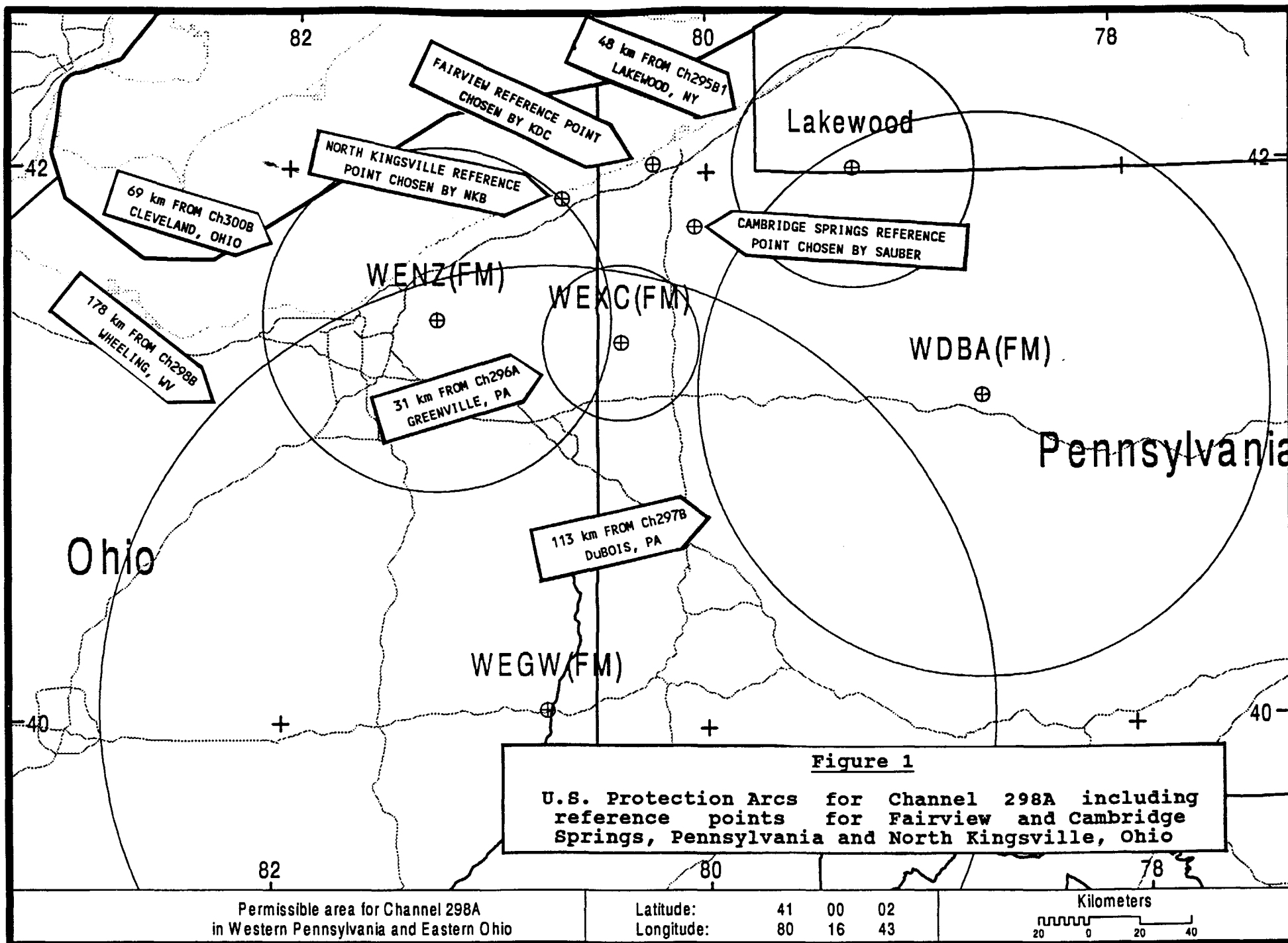
REFERENCE CO-ORDINATES: 41 48 13 North Latitude  
 80 3 24 West Longitude

CITY/STATE/COUNTRY	CALL	POWER	HEIGHT	TD2	STATUS	CHANNEL	BUFFER	REQ	DIST	AZIMUTH	LATITUDE	LONGITUDE	FILE #
CHANNEL 298													
Welland	ON CA	0.00	0	NNN	FA	298A	-33.1	180.0	146.92	26.5	42 59 0	79 15 0	
Stratford	ON CA	0.00	0	NNN	FA	298A	8.5	180.0	188.48	337.5	43 22 0	80 57 0	
Lakewood	NY US	0.00	0	NNN	FA VACANT	295B1	19.5	48.0	67.50	69.3	42 0 54	79 17 38	
Lakewood	NY US NEW	25.00	100	NNN	FM APP	295B1	19.5	48.0	67.51	74.0	41 58 5	79 16 25	930528MC
Lakewood	NY US NEW	5.20	218	NNN	FM APP	295B1	19.6	48.0	67.55	74.9	41 57 31	79 16 11	930527MH
Dubois	PA US WDBA	50.00	152	NNN	FM LIC	297B	19.8	113.0	132.80	120.5	41 11 28	78 41 27	BLH6868
Dubois	PA US	0.00	0	NNN	FA USED	297B	19.8	113.0	132.80	120.5	41 11 28	78 41 27	
Lakewood	NY US NEW	25.00	100	NNN	FM APP	295B1	20.9	48.0	68.87	70.3	42 0 33	79 16 25	930527ME
Lakewood	NY US NEW	25.00	100	NNN	FM APP	295B1	20.9	48.0	68.88	70.4	42 0 30	79 16 23	930525MD
Lakewood	NY US NEW	25.00	100	NNN	FM APP	295B1	20.9	48.0	68.88	70.4	42 0 30	79 16 23	930527MG
Lakewood	NY US NEW	25.00	100	NNN	FM APP	295B1	20.9	48.0	68.88	70.4	42 0 30	79 16 23	930527MQ
Greenville	PA US	0.00	0	NNN	FA USED	296A	23.9	31.0	54.92	212.4	41 23 10	80 24 35	
Greenville	PA US WEXC	3.00	73	NNN	FM LIC	296A	23.9	31.0	54.92	212.4	41 23 10	80 24 35	BLH5859
Wheeling	WV US	0.00	0	NNN	FA USED	298B	24.1	178.0	202.15	197.0	40 3 41	80 45 8	
Wheeling	WV US WEGW	10.50	269	NNN	FM CP	298B	24.1	178.0	202.15	197.0	40 3 41	80 45 8	BPH9204031E
Wheeling	WV US WEGW	12.50	265	NNN	FM LIC	298B	24.1	178.0	202.15	197.0	40 3 41	80 45 8	BLH3032
Cleveland	OH US WENZ	16.00	272	NYN	FM LIC	300B	40.2	69.0	109.19	250.2	41 27 54	81 17 13	BLH870220KG
Cleveland	OH US	0.00	0	NNN	FA USED	300B	40.4	69.0	109.36	250.4	41 28 3	81 17 25	
Clarendon	PA US WOVU	4.70	113	NNN	FM CP	295A	42.9	31.0	73.88	88.8	41 48 50	79 10 4	BPH920306MA
Mercer	PA US WLLF	1.40	148	NNN	FM LIC	244A	47.6	10.0	57.63	198.7	41 18 43	80 16 39	BLH871130KD
Mercer	PA US	0.00	0	NNN	FA USED	244A	47.6	10.0	57.63	198.7	41 18 43	80 16 39	
Wethersfield Town	NY US	0.00	0	NNN	FA USED	299B	59.1	113.0	172.11	57.4	42 37 23	78 17 16	
Wethersfield Town	NY US WNUC	11.50	244	NNN	FM LIC	299B	59.1	113.0	172.11	57.4	42 37 23	78 17 16	BLH850226KP
Elyria	OH US WNWV	50.00	142	NNN	FM LIC	297B	60.0	113.0	173.03	250.5	41 16 10	82 0 16	BLH860820KA
Elyria	OH US	0.00	0	NNN	FA USED	297B	60.0	113.0	173.03	250.5	41 16 10	82 0 16	

STUDY COMPLETE.  
 25 RECORDS PRINTED.

TABLE 3

Computer printout showing spacings  
 of interest for Channel 298A near  
 Cambridge Springs, Pennsylvania



\*\*\*\*\*  
 \* PROGRAM FMSRCH \*  
 \* COPYRIGHT 1986 AND 1991 BY GLEN CLARK \*  
 \* VERSION 1.5 - 31 MAY 1992 \*  
 \*\*\*\*\*

STUDY NAME - NORTH KINGSVILLE OHIO

SEARCHED FROM CHANNEL 241 TO CHANNEL 241.

CLASS OF CHANNEL STUDY: A

THE BUFFER DISTANCE IS - 70.00 KM.

CLASS D STATIONS NOT INCLUDED IN PRINTOUT.

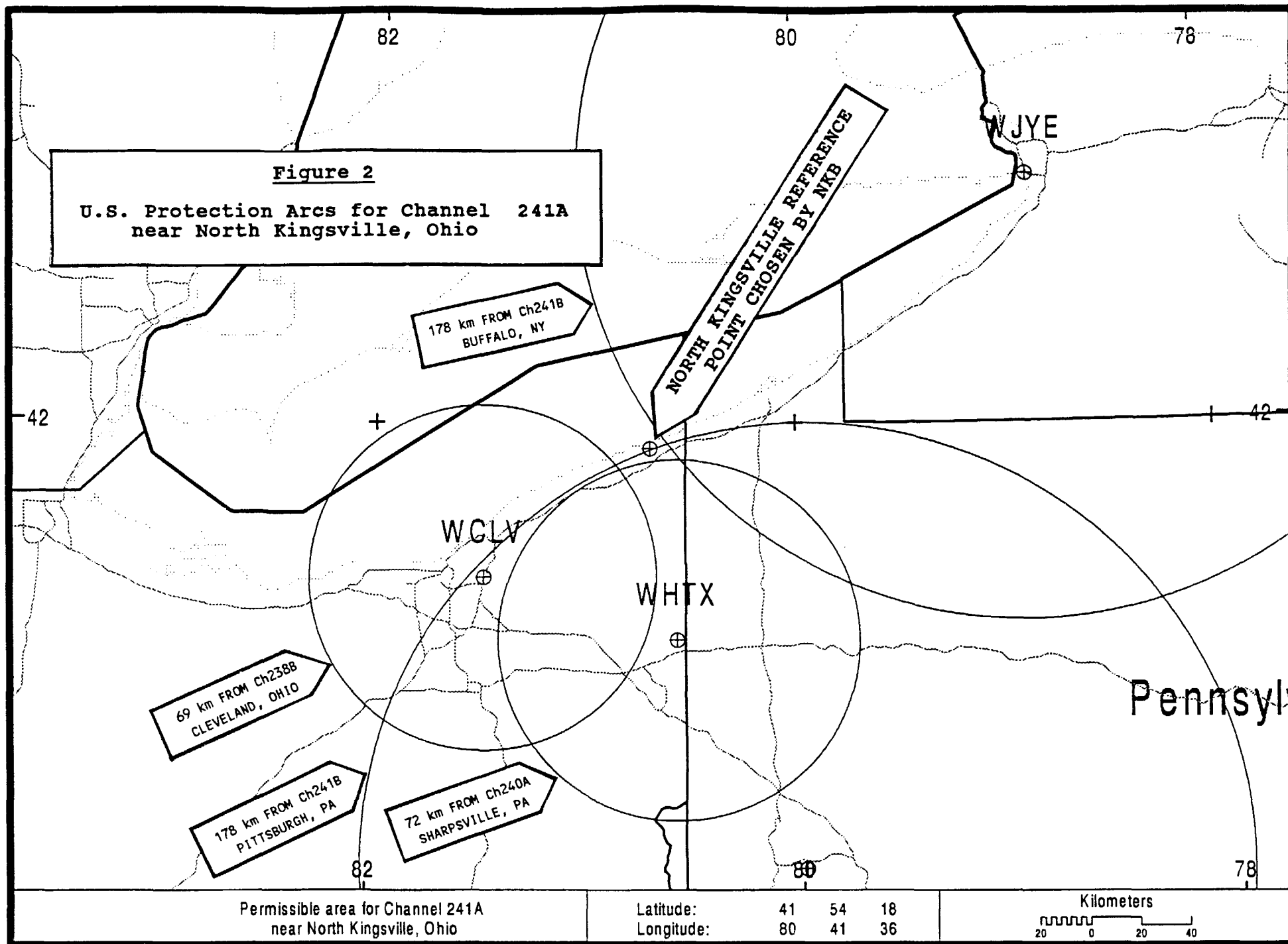
REFERENCE CO-ORDINATES: 41 54 18 North Latitude  
 80 41 36 West Longitude

CITY/STATE/COUNTRY	CALL	POWER	HEIGHT	TD2	STATUS	CHANNEL	BUFFER	REQ	DIST	AZIMUTH	LATITUDE	LONGITUDE	FILE #
CHANNEL 241													
London	ON CA	CFPLFM	180.00	270	NNN FM	240C1	-55.3	181.0	125.71	338.2	42 57 15	81 15 58	
Pittsburgh	PA US	WVTY	44.00	159	NNN FM LIC	241B	0.4	178.0	178.38	159.7	40 23 49	79 57 43	BLH920206KC
Pittsburgh	PA US		0.00	0	NNN FA USED	241B	0.4	178.0	178.38	159.7	40 23 49	79 57 43	
Sharpsville	PA US		0.00	0	NNN FA USED	240A	5.1	72.0	77.08	171.8	41 13 5	80 33 43	
Sharpsville	PA US	WHTX	3.00	100	NNN FM LIC	240A	5.1	72.0	77.08	171.8	41 13 5	80 33 43	BLH850912KA
Sharpsville	PA US	WHTX	6.00	100	NYF FM APP	240A	5.1	72.0	77.08	171.8	41 13 5	80 33 43	BPH900517IE
Buffalo	NY US	WJYE	50.00	146	NNN FM LIC	241B	7.3	178.0	185.27	53.3	42 53 10	78 52 25	BLH6053
Buffalo	NY US		0.00	0	NNN FA USED	241B	7.3	178.0	185.27	53.3	42 53 10	78 52 25	
Cleveland	OH US	WCLV	31.00	189	NNN FM LIC	238B	15.0	69.0	84.00	232.4	41 26 32	81 29 28	BLH871207KD
Cleveland	OH US		0.00	0	NNN FA USED	238B	15.0	69.0	84.00	232.4	41 26 32	81 29 28	
Oil City	PA US		0.00	0	NNN FA USED	242A	26.0	72.0	97.95	122.7	41 25 30	79 42 24	
Oil City	PA US	WKQWFM	6.00	100	NNN FM LIC	242A	30.7	72.0	102.67	123.2	41 23 45	79 39 53	BLH920921KD
Akron	OH US		0.00	0	NNN FA USED	243B	35.4	69.0	104.43	221.7	41 12 5	81 31 25	
Akron	OH US	WKDD	50.00	134	NNN FM LIC	243B	35.4	69.0	104.43	221.7	41 12 5	81 31 25	BLH7094
Mercer	PA US	WLLF	1.40	148	NNN FM LIC	244A	43.4	31.0	74.43	152.2	41 18 43	80 16 39	BLH871130KD
Mercer	PA US		0.00	0	NNN FA USED	244A	43.4	31.0	74.43	152.2	41 18 43	80 16 39	
Huron	OH US	NEW	3.00	100	NNN FM APPDID	241A	46.7	115.0	161.67	247.6	41 20 14	82 28 46	BPH870331PF
Huron	OH US	NEW	3.00	100	NNN FM APPDID	241A	46.9	115.0	161.90	248.0	41 20 51	82 29 18	BPH8703310B
Huron	OH US	NEW	3.00	100	NNN FM APPGID	241A	46.9	115.0	161.90	248.0	41 20 51	82 29 18	BPH870415MO
Huron	OH US		0.00	0	NNN FA VACANT	241A	50.2	115.0	165.17	250.4	41 23 36	82 33 18	
Huron	OH US	NEW	3.00	100	NNN FM APPDID	241A	52.3	115.0	167.28	247.0	41 18 10	82 31 57	BPH870327KA
Huron	OH US	NEW	3.00	100	NNN FM APPDID	241A	57.6	115.0	172.61	250.9	41 22 50	82 38 37	BPH870410KC

STUDY COMPLETE.  
 22 RECORDS PRINTED.

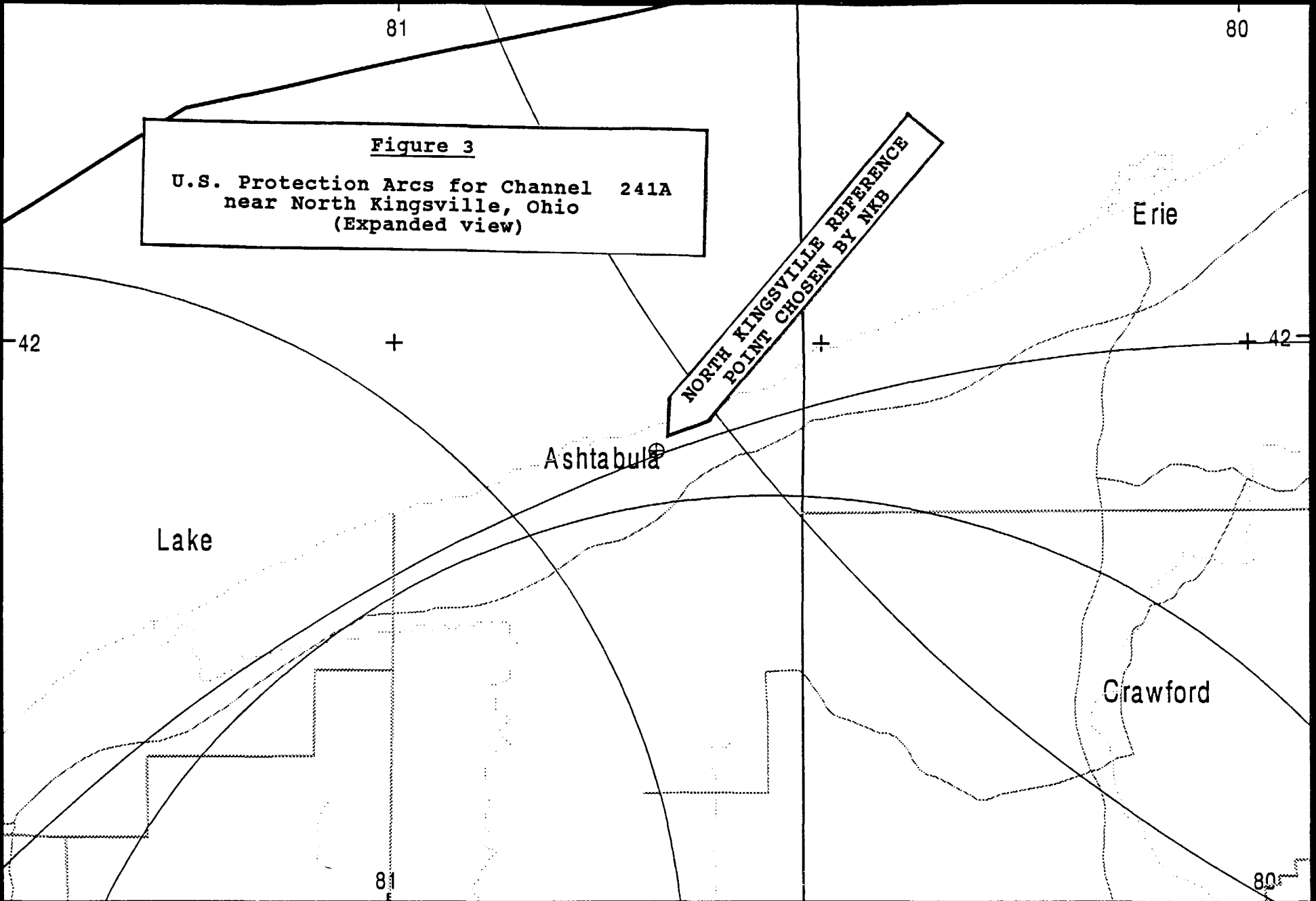
#### TABLE 4

Computer printout showing spacings  
 of interest for Channel 241A near  
 North Kingsville, Ohio



**Figure 3**  
U.S. Protection Arcs for Channel 241A  
near North Kingsville, Ohio  
(Expanded view)

NORTH KINGSVILLE REFERENCE  
POINT CHOSEN BY NKB



Permissible area for Channel 241A  
near North Kingsville, Ohio

Latitude:	41	54	18
Longitude:	80	41	36

Meters  
5000 0 5000 10000

\*\*\*\*\*  
 \* PROGRAM FMSRCH \*  
 \* COPYRIGHT 1986 AND 1991 BY GLEN CLARK \*  
 \* VERSION 1.5 - 31 MAY 1992 \*  
 \*\*\*\*\*

STUDY NAME - CAMBRIDGE SPRINGS PA

SEARCHED FROM CHANNEL 283 TO CHANNEL 283.

CLASS OF CHANNEL STUDY: A

THE BUFFER DISTANCE IS - 70.00 KM.

CLASS D STATIONS NOT INCLUDED IN PRINTOUT.

REFERENCE CO-ORDINATES: 41 48 13 North Latitude  
 80 3 24 West Longitude

CITY/STATE/COUNTRY	CALL	POWER	HEIGHT	TD2	STATUS	CHANNEL	BUFFER	REQ	DIST	AZIMUTH	LATITUDE	LONGITUDE	FILE #
CHANNEL 283													
Toronto	ON CA	CHUMFM	40.00	421	YNN FM	283C1	-44.5	256.0	211.50	14.7	43 38 33	79 23 15	
Clarendon	PA US		0.00	0	NNN FA VACANT	282A	4.1	72.0	76.09	90.9	41 47 21	79 8 29	
Wooster	OH US		0.00	0	NNN FA USED	283B	13.3	178.0	191.27	234.5	40 47 31	81 54 17	
Wooster	OH US	WQKT	52.00	101	NNN FM LIC	283B	13.3	178.0	191.27	234.5	40 47 31	81 54 17	BLH790215AH
Geneva	OH US		0.00	0	NNN FA VACANT	284A	16.9	72.0	88.85	270.9	41 48 39	81 7 33	
East Liverpool	OH US		0.00	0	NNN FA USED	282B	25.1	113.0	138.15	199.5	40 37 48	80 36 10	
East Liverpool	OH US	WELA	50.00	150	NYN FM APP	282B	25.1	113.0	138.15	199.5	40 37 48	80 36 10	BPH9006261C
East Liverpool	OH US	WELA	50.00	101	NYN FM LIC	282B	25.1	113.0	138.15	199.5	40 37 48	80 36 10	BLH790529AB
Pittsburgh	PA US	WXRБ	50.00	152	NNN FM LIC	284B	25.5	113.0	138.55	170.4	40 34 24	79 46 58	BLH4892
Pittsburgh	PA US		0.00	0	NNN FA USED	284B	25.5	113.0	138.55	170.4	40 34 24	79 46 58	
Pittsburgh	PA US	WXRБ	19.00	242	NYN FM APP	284B	32.4	113.0	145.36	178.3	40 29 43	80 0 18	BMPH9104031E
Pittsburgh	PA US	WXRБ	19.00	242	NYN FM CP	284B	32.4	113.0	145.36	178.3	40 29 43	80 0 18	BPH9011201A
Mercer	PA US	WWIZ	3.00	91	NNN FM LIC	280A	40.3	31.0	71.32	200.7	41 12 10	80 21 30	BLH5467
Mercer	PA US		0.00	0	NNN FA USED	280A	40.3	31.0	71.32	200.7	41 12 10	80 21 30	
Wellsboro	PA US		0.00	0	NNN FA USED	283B	46.0	178.0	224.02	91.0	41 44 17	77 21 50	
Wellsboro	PA US	WNBTFM	50.00	116	NNN FM LIC	283B	46.0	178.0	224.02	91.0	41 44 17	77 21 50	BLH6205
Geneva	OH US	WKKY	3.00	91	NNN FM LIC	285A	47.0	31.0	78.00	271.7	41 49 16	80 59 42	BLH871204KB
Salem	OH US		0.00	0	NNN FA USED	286B	51.8	69.0	120.84	212.6	40 53 6	80 49 50	
Salem	OH US	WQXK	88.00	131	NNN FM LIC	286B	51.8	69.0	120.84	212.6	40 53 6	80 49 50	BLH810309AD
Salem	OH US	WQXK	22.50	265	NNN FM CP MOD	286B	51.9	69.0	120.85	212.6	40 53 8	80 49 55	BMPH930115JW
Port Colborne	ON CA		0.00	0	NNN FR	285B	54.8	83.0	137.80	29.1	42 53 0	79 14 0	
Port Colborne	ON CA		0.00	0	NNN FA	285B	54.8	83.0	137.80	29.1	42 53 0	79 14 0	

STUDY COMPLETE.  
 22 RECORDS PRINTED.

TABLE 5

Computer printout showing spacings  
 of interest for Channel 283A near  
 Cambridge Springs, Pennsylvania

